

FOR THE DISTRICT OF UTAH

: Judge Dee Benson

Defendants Boy Scouts of America and Great Salt Lake Council Inc. (collectively “BSA”), by and through counsel, hereby reply to the Cross-claim of co-defendant Professional Association of Dive Instructors (“PADI”) as follows:

1. BSA incorporates and re-alleges the responses provided in their Amended Answer to Plaintiff’s Complaint, and denies the remainder of paragraph 1.

2. BSA incorporates and re-alleges the responses provided in their Amended Answer to Plaintiff’s Complaint, and denies the remainder of paragraph 2.

3. BSA denies that PADI is entitled to any apportionment of fault to BSA, and incorporates and re-alleges the responses provided in their Answer to Plaintiff’s Complaint.

4. Admit.

5. Admit.

6. Admit.

7. BSA incorporates and re-alleges the responses provided in their Amended Answer to Plaintiff’s Complaint, and denies the remainder of paragraph 7.

8. BSA denies that PADI is entitled to any apportionment of fault to BSA, and incorporates and re-alleges the responses provided in their Answer to Plaintiff’s Complaint.

WHEREFORE, BSA respectfully requests that the Court:

1. Deny PADI’s claims for allocation of fault with respect to BSA; and

2. Award such other relief as the court deems just and proper.

DATED this 28 day of June, 2013.

KIPP AND CHRISTIAN, P.C.

A handwritten signature in black ink, appearing to read "Michael F. Skolnick", written over a horizontal line.

Michael F. Skolnick

Samuel A. Goble

*Attorneys for Boy Scouts of America and Great Salt
Lake Council Inc., Boy Scouts of America*

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of June, 2013, a true and correct copy of the foregoing **DEFENDANTS BOY SCOUTS OF AMERICA, and GREAT SALT LAKE COUNCIL INC.'S REPLY TO DEFENDANT PROFESSIONAL ASSOCIATION OF DIVE INSTRUCTORS CROSS-CLAIM**, was served upon the following counsel through the U.S. District Court ECF filing system to the following:

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